

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,  
Plaintiff,

v

WELLS ENTERPRISES, INC.,  
Defendant.

WELLS ENTERPRISES, INC.,  
Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,  
Counterclaim Defendant.

Case No.: 1:14-cv-02223-NRB-RLE

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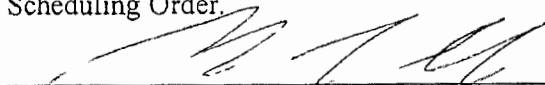
**STIPULATION TO EXTEND TIME**

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever ("Unilever"), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. ("Defendant") (hereinafter collectively, the "Parties"), stipulate and agree that all deadlines set forth in the Court's September 21, 2015 order (the "Order") shall be extended by 30 days, as follows:

Event	Current Deadline	Proposed Deadline
Initial expert reports due	October 21, 2015	November 20, 2015
Rebuttal expert reports due	November 25, 2015	December 25, 2015
Close of all fact discovery	December 28, 2015	January 27, 2016

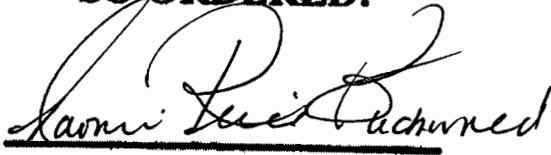
Event	Current Deadline	Proposed Deadline
Close of all expert discovery	January 15, 2016	February 16, 2016
Last day to file case dispositive motions	January 29, 2016	February 29, 2016

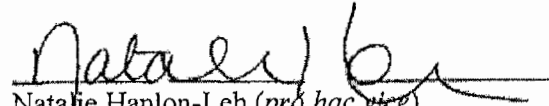
This stipulation is the Parties' fifth request to extend the deadlines set forth in the case. Your Honor granted the Parties' previous requests to extend the case deadlines. The requested extension is not being sought for the purpose of delay, but so that the Parties can finalize and execute their settlement agreement. Specifically, the Parties have reached an agreement as to the final terms of the settlement agreement and are now in the process of coordinating execution of the final agreement. Accordingly, the Parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's September 21, 2015 order be continued as set forth above. The Parties submit the enclosed proposed Revised Scheduling Order.

  
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*Attorneys for Plaintiff-Counterclaim Defendant  
 Conopco, Inc. d/b/a Unilever*

**SO ORDERED:**

  
**U.S.D.J.**

  
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